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NEW MEXICO ENVIRONMENT DEPARTMENT

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BUTCH TONGATE
Cabinet Secretary
J. C. BORREGO
Deputy Secretary

Certified Mail – Return Receipt Requested

April 19, 2017

Mr. Humberto Reyes,
Plant Manager
New Aces Pecan Company
2455 Entrada Del Sol
Las Cruces, NM 88001

**Re: New Aces Pecan Company, MSGP; SIC 2099; NPDES Compliance Evaluation Inspection;
NPDES # NMR053428; March 20, 2017**

Dear Mr. Humberto Reyes:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

NPDES Enforcement Coordinator
Environmental Protection Agency, Region 6
NPDES Enforcement Branch (6EN-WM)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

New Aces Pecan Company, NPDES #NMR053428

April 19, 2017

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David Long is USEPA Region 6's Acting NPDES Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Jennifer Foote at (505)827-0596 or at Jennifer.Foote@state.nm.us.

Sincerely,

/s/ Sarah Holcomb

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
Robert Houston, USEPA (6EN)
Darlene Whitten-Hill, USEPA (6EN) by e-mail
Michael Kesler, NMED District III by e-mail
Peter Bennett, City of Las Cruces, by e-mail



Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5 3 N M R 0 5 3 4 2 8 11 12 1 7 0 3 2 0 17 18 ~ 19 S 20					
Remarks					
S E C T O R U F O O D P R O D U C T S					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 3	71 N 72 N 73 74 75		80	

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time /Date 1:10 pm 3/20/17	Permit Effective Date 6-4-2015
New Aces Pecan Company 2455 Entrada Del Sol Las Cruces, NM 88001 Dona Ana County	Exit Time/Date 2:50 PM 3/20/17	Permit Expiration Date 6-4-2020
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data	
Humberto Reyes, Plant Manager, 575-523-8550 Natalie Flores, QA Coordinator, 575-523-8550	GPS 32.310717 -106.747858 SIC 2099	
Name, Address of Responsible Official/Title/Phone and Fax Number	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Humberto Reyes, Plant Manager 2455 Entrada Del Sol Las Cruces, NM 88001		

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	S	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	S	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See attached sheets for further details.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Jennifer Foote /s/ Jennifer Foote	NMED/SWQB 505-827-0596	4-18-17
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date
Sarah Holcomb, Program Manager /s/ Sarah Holcomb	NMED/SWQB 505-827-2798	4/17/17

NPDES Industrial Storm Water Checklist (MSGP)

National Database Information		General	
Inspection Type	Compliance Evaluation	Inspector Name	Jennifer Foote
NPDES ID Number	NMR053428	Telephone	505-827-0596
Inspection Date	3/20/17	Entry Time	1:10 PM
Inspector Type (circle one)	<input type="checkbox"/> EPA <input checked="" type="checkbox"/> State <input type="checkbox"/> EPA Oversight	Exit Time	2:50 PM
Facility Sector/ SIC/Activity Code	Sector U Food and Kindred Products/SIC 2099	Signature	/s/ Jennifer Foote

Facility Location Information				
Name/Location/ Mailing Address	New Aces Pecan Company 2455 Entrada Del Sol Las Cruces, NM 88001			
GPS Coordinates	Latitude	32.310717	Longitude	-106.747858
Receiving Water(s)	Las Cruces MS4 thence to Rio Grande in segment 20.6.4.101 NMAC			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Humberto Reyes, Plant Manager	575-523-8550
Facility Contact	Humberto Reyes, Plant Manager Natalie Flores, QA Coordinator	575-523-8550
Authorized Official(s)	Humberto Reyes, Plant Manager	575-523-8550

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	SWPPP Prepared & Available	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Permit Type	<input checked="" type="checkbox"/> General	<input type="checkbox"/> Individual	SWPPP Contents Satisfactory	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Operational Date	March 2014		SWPPP Implementation Satisfactory	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
NOI/Application Date	11-9-16		SWPPP Date	10-1-16	
If applicable, is no exposure certification on file?	<input type="checkbox"/> Y	<input type="checkbox"/> N <input checked="" type="checkbox"/> N/A	Intentionally left blank		

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General	Notes:		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Copy of the NOI and acknowledgment letter from EPA?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Copy of the permit language?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: <ul style="list-style-type: none"> Routine facility inspection (4.1.3) Quarterly visual assessment (4.2.3) Benchmark monitoring (6.2.1.3). 	<input type="checkbox"/> Y	<input type="checkbox"/> N	n/a
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	<input type="checkbox"/> Y	<input type="checkbox"/> N	n/a
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Did all "operators" sign/certify the SWPPP?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Is the storm water pollution prevention team identified (name or title)?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	General location map does not show receiving waters
Is there a site specific site map?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain the size of the property in acres?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain directions of storm water flow (indicated by arrows)?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain locations of all existing structural control measures?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Outdoor storage areas not located on map, hopper loading area not shown.
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the site map contain locations of all storm water monitoring points?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Storm drain on north side that drains to treatment unit is not on map.
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Map shows MS4 managed retention pond
Does the site map contain locations and descriptions of all non-storm water discharges?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
<p>Does the site map contain locations of the following activities where these activities are exposed to precipitation?</p> <ul style="list-style-type: none"> Fueling stations Vehicle and equipment maintenance and/or cleaning areas Loading/unloading areas Locations used for the treatment, storage or disposal of wastes Liquid storage tanks Processing and storage areas Immediate access roads and rail lines used or travelled by carriers of raw materials, manufactured products, waste materials, or by-products used or created by the facility Transfer areas for substances in bulk Machinery 	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<p>Outdoor storage areas not located on map, hopper loading area not shown.</p>
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A. No approved non-stormwater discharges are described in plan.
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<p>Not all material storage listed. Some metalwork occurs indoors for facility repairs and metal is stored outdoors. Supersacks and bins stored outside. Hopper and pecan shells/moisture not listed as potential pollutants/activities.</p>
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	<p>Includes information on non-permitted discharge which has been halted.</p>

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>		Notes:	
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: <ul style="list-style-type: none"> Date Description of evaluation criteria List of the outfalls or onsite drainage points directly observed Different types of non-storm water discharges and source locations Actions taken such as a list of control measures for elimination. 	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Includes report and corrective action for pasteurizer tank. No other non-stormwater discharges evaluated. During inspection non-stormwater was noted on the north side of the facility, facility stated stormdrain is connected to wastewater treatment (photo 4).
Does salt storage occur at this facility?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

<u>Controls to Reduce Pollutants</u>		Notes:	
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Controls to Reduce Pollutants</u>			Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include a schedule for preventative maintenance procedures?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility implement procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP document erosion and sediment controls?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Employee Training – is there a schedule for regular (at least annually) employee training?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Has been hooked up to wastewater pretreatment system.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
<u>General</u>	Notes:		
Routine Facility Inspections			
Are routine facility inspections conducted at least quarterly while facility operating?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Inspections conducted 10/3/17 and 1/17/17.
Are inspections documented, including: <ul style="list-style-type: none"> Date and time Name and signature of inspector Weather information and a description of discharge occurring at the time of the inspection Previously unidentified discharges from site Control measures needing maintenance or repairs Failed control measures that need replacement Incidents of noncompliance observed Additional control measures needed. 	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> Inactive and unstaffed sites 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Quarterly Visual Assessment			
Are quarterly visual assessments conducted?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Visual Assessments conducted: 11/4/16, 1/15/2017
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> Within the first 30 minutes of discharge On discharges that occur at least 72 hours (3 days) from the previous discharge Collected in a clean, clear glass or plastic container. 	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
Are assessments documented, including: <ul style="list-style-type: none"> • Sample location • Sample collection date/time & visual assessment date/time • Personnel collecting sample & performing assessment and their signature • Nature of the discharge (runoff or snowmelt) • Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) • Probable sources of contamination • If applicable, reason for not taking samples within 1st 30 minutes. 	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Exceptions, including (see 4.2.3): <ul style="list-style-type: none"> • Adverse weather conditions • Climates with irregular storm water runoff • Areas subject to snow • Substantially identical outfalls (per 5.1.5.2) • Inactive and unstaffed sites. 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Comprehensive Site Inspections			
Are comprehensive site inspections conducted annually (start 9/29/08)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A – Permit issued Nov 2016
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Cover all areas of the facility?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Include a review of monitoring data? Do inspectors consider the results of the past year's visual and analytical monitoring when planning and conducting inspections?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
<p>Include observations of the following:</p> <ul style="list-style-type: none"> • Industrial materials, residue, or trash that may have or could come into contact with storm water • Leaks or spills from industrial equipment, drums, tanks, and other containers • Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site • Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas • Control measures needing replacement, maintenance, or repair • All storm water control measures observed. 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<p>Are inspections documented, including:</p> <ul style="list-style-type: none"> • Date of inspection • Names and titles of personnel making the inspection • Findings from examination of areas of facility from Part 4.3.1 • All observations relating to implementation of control measures • Any required revisions to the SWPPP resulting from inspection • Any incidents of noncompliance identified OR certification that facility is in compliance with the permit • A statement signed in accordance with Appendix B, Subsection 11 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6)			
<u>General</u>	Notes:		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Are samples analyzed in accordance with 40 CFR Part 136 methods?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Benchmark Monitoring			
Does the monitoring consist of a sample collected: <ul style="list-style-type: none"> • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall • Prior to commingling. 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Is the average of the first four quarterly samples < the parameter benchmark?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring			
<p>Is the average of the first four quarterly samples > the parameter benchmark?</p> <ul style="list-style-type: none"> Make the necessary modifications Continue quarterly monitoring Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA Natural background pollutant level documentation 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<p>Exceptions, including (see 6.1 & 6.2):</p> <ul style="list-style-type: none"> Adverse weather conditions Climates with irregular storm water runoff Snowmelt Substantially identical outfalls (per 5.1.5.2) Inactive and unstaffed sites. 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Effluent Limitations Monitoring			
<p>Sampled once per year?</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<p>Follow-up requirements if discharge exceeds effluent limit (see 6.3)?</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Other Required Monitoring			
<ul style="list-style-type: none"> State or Tribal provisions Discharges to impaired waters Additional monitoring required by EPA. 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Reporting (Part 7)			
<u>General</u>	Notes:		
<p>Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<p>Is the annual report submitted by 45 days after conducting the comprehensive site inspection?</p>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Annual report submitted electronically.
<p>If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received?</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff	<p><i>(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system)</i></p> <p>Site does not receive significant run-on. Most storage materials are stored off the ground and out of drainage path. (Photo 5)</p>
Good Housekeeping	<p><i>(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)</i></p> <p>Site had been swept recently, site was orderly.</p>
Preventative maintenance	<p><i>(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)</i></p> <p>n/a</p>

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	<p><i>(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)</i></p> <p>Pasteurizer and pretreatment is installed over sump pit. New drain pipe from hopper installed to create permanent drain. (Photo 3)</p>
Erosion and Sediment Controls	<p><i>(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)</i></p> <p>Facility is paved and curbed.</p>
Management of Runoff	<p><i>(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)</i></p> <p>Facility is paved and curbed.</p>
Salt Storage Piles	<p><i>(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)</i></p> <p>N/A</p>

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Waste, Garbage and Floatable Debris	<p><i>(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)</i></p> <p>Facility had been recently swept. Dumpsters were covered but drain plugs were open (photo 2)</p>
Evidence of non-storm water discharges	<p>Non-storm water discharges flow to treatment works. (photo 4)</p>
Dust Generation and Vehicle Tracking of Industrial Materials	<p><i>(minimize generation of dust and off-site tracking of raw, final, or waste materials)</i></p> <p>Truck beds are to be covered, roadways are paved. Site had been swept.</p>

**NMED/SWQB
Official Photograph Log
Photo # 1**

Photographer: J. Foote

Date: 3/20/17

Time: abt 2pm

City/County: Las Cruces/Dona Ana County

State: New Mexico

Location: New Aces Pecan Co.

Subject: staining shows some flow to the NW along Entrada del Sol Blvd



**NMED/SWQB
Official Photograph Log
Photo # 2**

Photographer: J. Foote

Date: 3/20/17

Time: abt 2pm

City/County: Las Cruces/Dona Ana County

State: New Mexico

Location: New Aces Pecan Co.

Subject: No plug on dumpster that has been leaking liquids



**NMED/SWQB
Official Photograph Log
Photo # 3**

Photographer: J. Foote

Date: 3/20/17

Time: abt 2pm

City/County: Las Cruces/Dona Ana County

State: New Mexico

Location: New Aces Pecan Co.

Subject: New drain pipe from hopper to wastewater pretreatment, area has been swept



**NMED/SWQB
Official Photograph Log
Photo # 4**

Photographer: J. Foote

Date: 3/20/17

Time: abt 2pm

City/County: Las Cruces/Dona Ana County

State: New Mexico

Location: New Aces Pecan Co.

Subject: condensate from building to storm drain connected to wastewater pretreatment



**NMED/SWQB
Official Photograph Log
Photo # 5**

Photographer: J. Foote

Date: 3/20/17

Time: abt 2pm

City/County: Las Cruces/Dona Ana County

State: New Mexico

Location: New Aces Pecan Co.

Subject: metal storage off ground



**NMED/SWQB
Official Photograph Log
Photo # 6**

Photographer: J. Foote

Date: 3/20/17

Time: abt 2pm

City/County: Las Cruces/Dona Ana County

State: New Mexico

Location: New Aces Pecan Co.

Subject: Outfall #1

